

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re	Chapter 7
VASCULAR ACCESS CENTERS, L.P.,	Case No. 19-17117 (AMC)
Debtor.	
STEPHEN V. FALANGA, AS CHAPTER 11 TRUSTEE FOR THE DEBTOR'S ESTATE,	
Plaintiff,	
v.	Adv. Proc. No. 21-00109 (AMC)
QCC INSURANCE COMPANY D/B/A INDEPENDENCE ADMINISTRATORS,	
Defendant.	

**CERTIFICATE OF NO OBJECTION REGARDING TRUSTEE'S MOTION FOR AN
ORDER APPROVING SETTLEMENT OF AVOIDANCE CLAIMS AGAINST QCC
INSURANCE COMPANY D/B/A INDEPENDENCE ADMINISTRATORS PURSUANT
TO RULE 9019 OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE**

Stephen V. Falanga, in his capacity as Chapter 7 Trustee for the bankruptcy estate of Vascular Access Centers, L.P. (the "**Trustee**"), by and through the undersigned counsel, hereby certifies as follows:

1. On March 7, 2023, the Trustee filed the *Trustee's Motion For An Order Approving Settlement of Avoidance Claims Against QCC Insurance Company d/b/a Independence Administrators Pursuant To Rule 9019 Of The Federal Rules Of Bankruptcy Procedure* [D.I. 1255] (the "**Motion**") with the United States Bankruptcy Court for the Eastern District of Pennsylvania (the "**Court**").
2. Objections to the Motion were due by March 21, 2023.

3. The time for responses has now expired and no objection or other response was filed.

4. Notice of the Motion was served on all required parties as appears from the Certificate of Service [D.I. 1260].

WHEREFORE, it is respectfully requested that the Court enter the Order approving the Motion.

Dated: March 22, 2023

BAYARD, P.A.

/s/ Evan T. Miller

Evan T. Miller, Esq.

Steven D. Adler, Esq.

600 N. King Street, Suite 400

Wilmington, Delaware 19801

Telephone: (302) 655-5000

Facsimile: (302) 658-6395

Email: emiller@bayardlaw.com
sadler@bayardlaw.com

*Proposed Counsel to Stephen V. Falanga in
his Capacity as Chapter 7 Trustee*